

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ARRIC PLOCH )  
Plaintiff, )  
v. ) No. 4:12-cv-00518HEA  
CLIENT SERVICES, INC. )  
Defendant. )

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT ON  
HIS CLAIM RE: 15 U.S.C. § 1692c(a)(2)**

COMES NOW, Plaintiff, Arric Ploch, and for his Motion for Summary Judgment states as follows:

1. Plaintiff incorporates by reference his Memorandum in Support and his Statement of Uncontroverted Facts, filed contemporaneously herewith.
2. Summary judgment is appropriate in Plaintiff's favor on his claim against Defendant pursuant to 15 U.S.C. § 1692c(a)(2) because the undisputed facts establish that Defendant communicated with Plaintiff when Defendant knew Plaintiff was represented by counsel.
3. Plaintiff seeks damages pursuant to 15 U.S.C. § 1692k consisting of \$1,000 for actual damages, \$1,000 in statutory damages, and attorneys' fees in an amount to be determined by the Court upon Plaintiff's Motion after the briefing is concluded on this issue.

Respectfully submitted,

**EASON & VOYTAS, LLC**

s/ James W. Eason

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**CERTIFICATE OF SERVICE**

The undersigned verifies that a copy of the foregoing document was served via electronic mail on the following counsel of record on March 23, 2012:

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/s/ James W. Eason